

**From:** George Kunkel Jr [<mailto:kunkelwaterefficiency@gmail.com>]

**Sent:** Tuesday, May 30, 2017 3:20 PM

**To:** DWR Water Use Efficiency

**Subject:** Chapter 7 Water Loss Audits and Water Loss Control Reporting - Comments to Modifications

Attention: Todd Thompson, Senior Engineer  
California Department of Water Resources  
Water Use Efficiency  
P.O. Box 942836  
Sacramento, CA 94236

**RE:** Comments to Notice of Modifications to Text of Proposed Regulations of Chapter 7, Division 2, of Title 23 which was the subject of a regulatory hearing on April 17, 2017.

SECTION 700.5 (c)

This section has been proposed to be modified to read as immediately below:

(c) In the case of urban retail water suppliers with two or more separate public potable water systems, the urban retail water supplier shall submit either separate AWWA Free Water Audit Software spreadsheet worksheets meeting the requirements in Section 700.5(b)(1) for each potable water system or a combined set of spreadsheet worksheets for its potable water systems.

COMMENTS TO SECTION 700.5 (c)

As proposed in the modified language, Section 700.5 (c) permits utilities owning multiple discrete water systems in California to combine the data of all of these systems and enter the composite data in a single Reporting Worksheet of the AWWA Free Water Audit Software.

This is considered to be very poor practice to the extent that it virtually invalidates the capabilities and benefits of the entire water audit process from the subject water utility/company. Such a submittal practice should be expressly disallowed and a separate and distinct water audit should be required for submittal for each separate and distinct water system that exists. The wording "or a combined set of spreadsheet worksheets for its potable water systems" should be allowed, and it is strongly recommended that Section 700.5 (c) be rewritten to read:

*700.5 (c) In the case of urban retail water suppliers with two or more separate public potable water systems, the urban retail water supplier shall submit a separate and distinct water audit in the AWWA Free Water Audit Software for each separate and distinct water system that it owns or manages. The submittal of a combined set of spreadsheet worksheets for its potable water systems is not permitted.*

The AWWA M36 Guidance Manual defines the water audit process as applying to individual systems. If a combined water audit submittal is permitted, then the data and performance indicators of each system will not be revealed and the combined submittal is of no value in overseeing the operation and financial performance of the individual systems. A combined submittal practice undermines the entire water audit process and it is strongly requested that such a practice not be allowed.

Sincerely,

George Kunkel

Principal, Kunkel Water Efficiency Consulting  
215-460-0662

Chair, M36 Sub-committee, AWWA  
Co-author, AWWA Free Water Audit Software

Chair, Technical Program Sub-Committee NAWL2017



[www.northamericanwaterloss.org](http://www.northamericanwaterloss.org)